

Bell Canada

H.R. BURROWS

Associate Director - Network Resource Research

Planning & Standards Research

F4, 160 Elgin St.

Ottawa, Ontario, Canada K1G 3J4

(613) 781-7971

FAX: (613) 781-0051

Envoy: HR.BURROWS

IIS: HBURROWS

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Bell

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Office of the Secretary
Federal Communications Commission
Washington, D.C.
U.S.A. 20554

Bell Canada submits the following comments on the F.C.C.'s Notice of Inquiry (N.O.I.) CC Docket No. 92-237 regarding the administration of the North American Numbering Plan and other numbering issues, to assist in the process of establishing consensus on the future of numbering plan administration in World Zone 1. The comments are offered as a basis for open discussion and should not be considered binding on Bell Canada.

Bell Canada, the largest Canadian telecommunications operating company, markets a full range of state-of-the-art products and services to over 7 million business and residence customers in the Canadian provinces of Ontario and Quebec. As the dominant carrier, Bell Canada administers the 8 geographic NPA codes which are currently in use in its territory. Also, Bell Canada proactively participates in Canadian, North American and International Standards bodies and industry fora which deal with network numbering, addressing and routing. It is from these perspectives that the following comments are offered.

Canada has historically been a full partner in the North America Numbering Plan (NANP). Bell Canada believes that the benefits of sharing this resource are significant and will continue to support an integrated World Zone 1 numbering plan, so long as our legitimate numbering resource requirements continue to be met.

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In the context of a shared numbering resource, Bell Canada recognizes the F.C.C.'s plenary authority over U.S. numbering resources and draws your attention to the Canadian situation where the Canadian Department of Communications (D.O.C.) exercises similar authority over NANP resources currently assigned to Canada as well as ensuring that the future needs of Canadian industry are met. It follows that, in Bell Canada's opinion, unassigned NANP numbers are a public resource which must be managed by World Zone 1 telecommunications industry and government in such a way so as to ensure that the overall best interests of the diverse and dispersed users, the rate payers, are served.

It is clear that this N.O.I. was triggered by complaints and allegations by some industry sectors that their numbering and addressing needs are not being met. It is Bell Canada's position that all legitimate (as defined by Canadian telecommunications regulations) numbering needs in our operating territory are being fully met. It is also our opinion that the same situation is basically true throughout World Zone 1.

The integrated numbering plan which serves all of World Zone 1 is, and will hopefully continue to be, the envy of the telecommunications world. Such a user friendly and efficient numbering plan has not happened by accident, but rather through the planning skills and expertise provided by the NANP Administrator over the past 40 years. In Bell Canada's opinion it would be extremely imprudent to destroy or disrupt the NANP Administration process until, and unless, a clearly superior alternative is found.

Bell Canada recognizes that major changes are occurring in the North American telecommunications industry. The new needs, do not, in our opinion warrant destroying the establishment. Rather a means should be sought to enable the establishment to satisfy the legitimate needs of all, while maintaining the integrity of the NANP.

This N.O.I. seeks comments on a number of topics. In the following sections Bell Canada provides input on 6 specific areas of concern. Our silence at this time on other subject matter mentioned in the N.O.I. does not imply our concurrence.

NANP ADMINISTRATION

Bell Canada submits the following recommendations regarding the role and authority of the NANP Administrator. Bell Canada has no strong opinion as to what organization should be charged with this responsibility. However, any change, must guarantee improvement and must not interfere with the ongoing

management of the NANP resource. The latter criteria would imply that no major change to the NANP Administrator should take place prior to the implementation of Interchangeable NPA (INPA) codes and/or the establishment of an industry agreed Long Range Numbering Plan.

The mission of the NANP Administrator is to ensure that numbering resources are available to meet the legitimate needs of the industry and its users in an efficient, timely, cost effective and impartial manner.

In order to accomplish this mission the following characteristics, processes and attributes must be ensured and the NANP Administrator must be:

1. Empowered to plan, manage and lead industry on all World Zone 1 numbering issues.
2. Accountable to the telecommunications industry through an Industry Advisory Board and public industry fora (e.g. ICCF).

Note: F.C.C., D.O.C., and Caribbean authorities must retain their relative plenary authority and responsibility for establishing policy.

3. Authorized to render decisions with or without telecommunications industry consensus.
4. Funded by all resource users in an equitable manner.
5. Guaranteed sufficient funding to acquire and maintain the necessary quantity and quality of technical staff and support services.
6. Able to select staff and special support requirements from all W.Z.1 sources.
7. Immune from legal threat or coercion.
8. Authorized to deal directly and autonomously with industry, user groups, government authorities, regulatory bodies, standards organizations and industry fora.

INDUSTRY ADVISORY BOARD

The concept of oversight through an Industry Advisory Board is a critical component of a revamped approach to NANP Administration. Bell Canada views the Industry Advisory Board function as primarily being a structured but open source of overall industry's view of numbering plan issues, which would enable the NANP Administrator, through Industry Advisory Board dialogue, to make informed decisions in a timely manner.

The NANP Industry Advisory Board must be:

1. Composed of a cross-section of telecommunication industry, government and user interests from World Zone 1.
2. Manageable in size (20 maximum).
3. Able to deal with all aspects of numbering resource decision making (technical, business, social, etc.).
4. Able and willing to take full advantage of "expert" input, consultation and discussion.
5. A standing committee, readily available to provide timely and informed input to the decision making process.

Note that while consensus in the Industry Advisory Board is highly desirable, it would not be required as the decision making responsibility would ultimately rest with the NANP Administrator.

PERSONAL COMMUNICATIONS SERVICE

With regard to Personal Communications Service (PCS) numbering, Bell Canada encourages the F.C.C. (and the D.O.C. in Canada) to continue to foster and support the development of industry agreement on PCS numbering, addressing and routing in the standards committees which are currently working this issue, specifically CCITT S.G. II and T1P1.3. Bell Canada also believes that it would be very beneficial if the F.C.C. (and the D.O.C. in Canada) would confirm the following fundamental principles with respect to PCS and PCS numbering:

1. That PCS and wireless are not synonymous.
2. That PCS numbers are to be assigned to persons not terminals.

3. That the critical new attribute in PCS architecture is the "Service Profile Manager" which keeps track of the PCS user's services and destination routing preferences in real time.

LOCAL NUMBER PORTABILITY

The concept of local number portability is introduced without definition in the N.O.I. In order to put our comments on this subject into context, Bell Canada defines local number portability as the ubiquitous ability of a user to change service provider and/or physical location without changing their telephone number.

This concept involves two very basic changes to the current architecture and operation of the network. First, number portability virtually destroys the fundamental geographic destination terminal concept on which today's routing and billing are based. Second, number portability mandates at least one database look-up before any call can be advanced. This look-up introduces new call set-up delay and reliability questions which have yet to be addressed.

Bell Canada believes that local number portability is very much a business issue (ie. who pays for it and to who's advantage). Further, we believe that ubiquitous local number portability would be many orders-of-magnitude more complex and costly to implement than 800 number portability. Finally, it is recognized that number portability should allow higher code fill rates and therefore must be considered when expansion alternatives are being investigated.

CARRIER IDENTIFICATION CODE (CIC) EXPANSION

Phase two of the N.O.I. focuses on Feature Group "D" CIC expansion to 4 digits. Bell Canada recognizes that this expansion of CIC capacity will be extremely costly. However, the decision on whether or not to expand must take into account the following Canadian situation.

To date, U.S. industry has consumed over 800 of the 1000 available CIC codes in their existing 3 digit format. Canada, due to a different regulatory environment, has acquired virtually no 3 digit CIC's (one Canadian company has been allocated 3-3 digit CIC's). However, a recent ruling by the Canadian regulator (CRTC) to allow interexchange competition in Canada changes this situation dramatically. The conditions of competition in Canada, while not yet finalized, assume the use of a Feature Group "B" and "D" type of access, which in turn creates a need for CIC's in Canada. If the integrated numbering plan scenario applies to the CIC environment, Canadian industry will draw from the same pool of 1000 codes that is now serving only the U.S.A.

History provides a reliable statistical formula for estimating the relative needs of the two countries. Typically, Canada's requirement is 10% of the U.S.A.'s. This statistic applies to a broad range of applications including population, car sales and NPA codes. If applied to CIC requirements, the Canadian need would be as high as 80 to 100 codes. This would necessitate expansion beyond the current limit of 1000 3 digit codes.

An alternative, which Bell Canada strongly supports, is to restrict the assignment of these resources to facilities-based long distance carriers. This approach, which we believe to be the original intent of this type of access arrangement, would result in the reclamation of hundreds of CIC's and perhaps preclude the need to ever expand this resource beyond 3 digits. We believe this alternative should be fully investigated before a decision is made to expand beyond 3 digit CIC's.

FUNDING FUTURE NANP EXPANSION

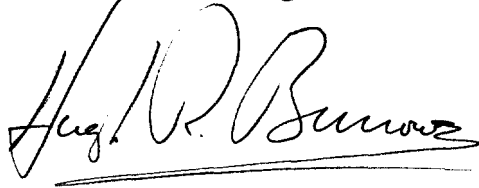
One major area of concern to Bell Canada which is not included in this N.O.I. involves the planning and funding of the next major expansion of the NANP. Specifically, what happens when the 800 3 digit NPA codes are exhausted? Traditionally, as in INPA implementation, the local exchange community bears the brunt of expansion costs. However, in the future, given the outlook of a highly diversified NPA/SAC allocation, the LEC community may not be willing, or able, to bear the full costs of expansion. It is therefore critical that an industry approved NANP expansion plan which addresses the funding responsibilities for future expansion be developed. It may be argued that the availability of 640 new INPA codes in 1995 negates the urgency for such long term expansion planning. However, Bell Canada is concerned that our (industry and government) enthusiasm to compete may result in a rapid, irrevocable depletion of the NPA code resource.

REPLY COMMENT SCHEDULE

Bell Canada is concerned that the relatively short time (30 days) allocated for reply comments to this N.O.I. may preclude comprehensive responses. Interested parties with no physical presence in Washington D.C. will be hard pressed to obtain copies of the initial input and develop meaningful reply comments by the current January 27, 1993 deadline. Therefore Bell Canada requests that the deadline for reply comments be extended to February 24, 1993.

In closing, Bell Canada would like to express our appreciation for having the opportunity to participate in this N.O.I. process. It is through such open communication that the interests of all World Zone 1 telecommunications industry and its users, the rate payers, can best be served. We would appreciate being kept apprised of any further activities related to this N.O.I.

Questions and comments regarding this Bell Canada submission should be directed to the undersigned.

A handwritten signature in black ink, appearing to read "Hug R. Burrows", is written over a horizontal line.

Associate Director - Network Resource Research

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c.c.: Gaston Dallaire - D.O.C.
Peyton Wynns - F.C.C.